

APR 18 2006

UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

TEXAS

AAF
Michael N. Kirby, Clerk
Laredo Division

UNITED STATES OF AMERICA

V.

Jorge A. Sanchez
Laredo, Texas

CRIMINAL COMPLAINT

Case Number: 5:06MJ 711

See Attachment A
(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about April 14, 2006 In Webb County, in
(Date)
the Southern District of Texas Defendant(s) did,

(Track Statutory Language of Offense)

Knowingly, willfully and unlawfully import from a place outside the United States, to wit; the Republic of Mexico to a place in the United States, to wit; Laredo, Texas, a controlled substance listed under Schedule II, Title II, of the Controlled Substance Act, to wit; approximately 16.60 kilograms, gross weight, of cocaine. Furthermore, the defendant(s) did knowingly and unlawfully possessed with intent to distribute the above listed cocaine,

in violation of Title 21 United States Code, Section(s) 952; 841(a)(1).

Special Agent, of U.S. Immigration

I further state that I am a(n) and Customs Enforcement and that this complaint is based on the
Official Title
following facts:

SEE ATTACHMENT A

Continued on the attached sheet and made a part of this complaint:

X Yes ☐ No

Signature of Complainant

S/A Daniel Perales
Printed Name of Complainant

Sworn to before me and signed in my presence,

April 18, 2006

Date

at

Laredo, Texas

City and State

Adriana Arce Flores, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

Attachment "A"

I, Daniel Perales, a Special Agent of Immigration and Customs Enforcement, have knowledge of the following facts:

1. On April 14, 2006, Jorge A SANCHEZ entered the United States, via International Port of Entry Bridge II, driving a 2004 Nissan Sentra bearing Texas license plate 301LFF.
2. At the primary inspection area, a query of vehicle plate resulted in a positive TECS lookout; SANCHEZ was referred for an intensive examination.
3. A Canine Enforcement Officer (CEO) utilized his narcotic detector dog to inspect the vehicle. The narcotic detector dog positively alerted to the presence of narcotics in the dashboard area of the vehicle.
4. A non-intrusive x-ray inspection of the vehicle revealed abnormalities within the firewall area.
5. An intensive examination by a Customs and Border Protection Officers (CBP) revealed 14 bundles within the firewall, which contained a white powdery substance that field-tested positive for cocaine. The total gross weight was approximately sixteen (16.60) kilograms.
6. SANCHEZ was advised of his Miranda rights and agree to make statements without an attorney. SANCHEZ stated he knew that the vehicle he was driving was loaded with narcotics.
7. SANCHEZ stated he was going to be paid one thousand dollars (\$1000.00) to deliver the vehicle to a pre-determined site in Laredo, Texas.